

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.: 4:14-cr-153 ERW (TCM)
	)	
JAMES STALEY	)	
	)	
Defendant.	)	

**DEFENDANT'S THIRD MOTION TO TRAVEL**

COMES NOW Defendant, James Staley, by and through counsel, and hereby moves this Court for permission to travel with his family to Table Rock Lake for a vacation in August of 2015. In support of this motion, Defendant states as follows:

1. Defendant pled guilty to four violations of Title 18 U.S.C. § 1343 on April 30, 2015.
2. Defendant's parents wish to take Defendant and his family on a vacation prior to any potential sentence Defendant may receive in this case. Defendant's parents are paying for the vacation but do not want to make reservations until they are certain Defendant will be allowed to travel.
3. If permitted to do so, Defendant would travel with his family to Table Rock Lake in August for a week to ten days and would provide a detailed itinerary to the pretrial services office once reservations are made.
4. Defendant has been on bond since June 24, 2015, and while he has accumulated four bond violations, the last was in February 2015.

5. Additionally, since Defendant's last violation, he has pled guilty, provided information to the probation office, remained in contact with our office and traveled to Israel and back from March 1 through March 12, 2015.

6. Defendant has given no reason to this Court or any individual to presume that his travel will present either a meaningful risk of flight or danger to the community.

7. Defendant, through counsel, has discussed this matter with United States Pretrial Services Officer Shannon McCallister. Ms. McCallister does not object to Defendant's request.

8. Defendant, through counsel, has also discussed this matter with Assistant United States Attorney Dianna Collins. Ms. Collins does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court permit him to travel with his family to Table Rock Lake for a vacation in August of 2015.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Marc M. Johnson  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 29, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Dianna Collins, assistant United States attorney.